EXHIBIT C

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Via Electronic Filing & U.S. Mail

Hon. Patty Shwartz, U.S.M.J. United States District Court District of New Jersey U.S. Post Office & Courthouse Bldg. 50 Walnut Street, Room 477 Newark, NJ 07101 (973)645-6596 & (fax)645-6478 March 3, 2006



Re: Liu v. Oriental Buffet, et al. Civil Action No: 03-2406 (KSH)

Dear Judge Shwartz:

This firm represents the Oriental Buffet, Inc. defendants. We join in the opposition submitted today on behalf of defendant Metropolitan Buffet and supplement as follows:

Plaintiffs are again asking this Court and defense counsel to address a discovery dispute without having the benefit of any facts upon which a well reasoned decision or compromise could be made. The present request is based merely upon the unsubstantiated "possibility" that an employer would fire an employee because of a third-party request for documents. This speculative harm supposedly outweighs the probative value of the information sought.

The Court, however, has already determined that the information is discoverable and

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plaintiffs have presented no information to support their assertion that the information would only be of marginal value. They have not informed the Court of their current positions or dates of employment. An employment record based upon one month of service may be marginal. Thus, we need to know, at a minimum, plaintiffs' current positions and dates of employment. If after full disclosure defendants determine that the current employment is not significant, defendants may be inclined to allow plaintiffs to obtain and produce all the records the defense would request from the employers directly.

Your time and attention to this matter are appreciated.

Respectfully submitted,

Steve Mannion

cc:

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